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*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**THIRD SUPPLEMENTAL DECLARATION  
OF TOBIAS S. KELLER PURSUANT TO  
11 U.S.C. § 327(a) AND FED. R. BANKR.  
P. 2014(a) AND 2016 ON BEHALF OF  
KELLER & BENVENUTTI LLP**

1 I, Tobias S. Keller, hereby declare pursuant 28 U.S.C. § 1746:

2 1. I am a partner of the firm of Keller & Benvenuti LLP (the “Firm”), a law firm with  
3 offices at 650 California Street, Suite 1900, San Francisco, California 94108.

4 2. I submit this Declaration as a supplement to my declaration dated March 13, 2019  
5 [Docket No. 870] (the “Original Declaration”) in support of the *Application of Debtors Pursuant to*  
6 *11 U.S.C. §327(a) and Fed. R. Bankr. Proc. 2014(a) and 2016 for Authority to Retain and Employ*  
7 *Keller & Benvenuti LLP as Co-Counsel for the Debtors Nunc Pro Tunc to the Petition Date.*<sup>1</sup>

8 3. On May 16, 2019, the Firm filed its first supplement to the Original Declaration  
9 [Docket No. 2042] in which it disclosed, among other things, a potential dispute as between the Fee  
10 Examiner’s proposed counsel and one of the Firm’s attorneys. On June 21, 2019, the Firm filed its  
11 second supplement to the Original Declaration [Docket No. 2715] further elaborating that potential  
12 dispute.

13 4. As anticipated in the Original Declaration, this declaration is submitted to supplement  
14 information disclosed in the Original Declaration; as additional information regarding parties in  
15 interest becomes available, further supplemental declarations will be submitted to the Court reflecting  
16 such amended, supplemented or otherwise modified information.

17 5. Since the filing of the Original Declaration, additional developments in the Chapter 11  
18 Cases require the supplemental disclosures set forth in the following paragraphs.

19 6. Disclosure Regarding Claims Representative for Unfiled Fire Claimants

20 a. On November 12, 2019, Michael G. Kasolas was appointed as the Claims  
21 Representative for Unfiled Fire Claimants by the *Order Extending Bar Date for Fire Claimants and*  
22 *Appointing Claims Representative* [Docket No. 4672].

23 b. One attorney of the Firm, Thomas Rupp, worked on representations of Mr.  
24 Kasolas in several engagements at his prior firm, usually in Mr. Kasolas’s capacity as a bankruptcy

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27 <sup>1</sup> Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms in  
28 the Original Declaration.

1 trustee or state court receiver. Mr. Rupp did not continue to represent Mr. Kasolas after leaving his  
2 prior firm.

3 7. Disclosure Regarding Previous Client

4 a. At his prior firm, Mr. Rupp also worked on a representation of a client<sup>2</sup> with an  
5 indirect interest in real property that was destroyed in the October 2017 Sonoma County fires. Mr.  
6 Rupp did not represent this former client in asserting any claims against the Debtors, and he did not  
7 continue to represent this client after leaving his prior firm.

8 8. Disclosure Regarding Fee Examiner

9 a. Bruce A. Markell, the Fee Examiner in these Chapter 11 Cases, informed the  
10 Court on October 28, 2019 [Docket No. 4709] that he is a friend and former partner of the father of an  
11 attorney of the Firm, Dara Silveira.

12 I declare under penalty of perjury that, to the best of my knowledge and after reasonable  
13 inquiry, the foregoing is true and correct and that this declaration was executed at San Francisco,  
14 California, on November 27, 2019.

15 /s/ Tobias S. Keller

16 Tobias S. Keller  
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26 <sup>2</sup> The name of the client was not disclosed in the *Declaration of Scott H. Mr. McNutt in Support of*  
27 *Application for Order Authorizing Employment of Scott H. McNutt as Counsel to Fee Examiner*  
28 [Docket No. 2559] for attorney-client confidentiality reasons.